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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION	§	CASE NO. 21-30085-__
OF AMERICA and SEA GIRT LLC,	§	
	§	
DEBTORS¹	§	Joint Administration Requested

NOTICE OF FILING REVISED PROPOSED ORDERS

PLEASE TAKE NOTICE of the revised proposed Orders, redlined versions of which are attached hereto as Exhibits, are submitted in connection with the following First Day Motions:

1. **Exhibit A** - Debtors' Emergency Motion for An Order Directing the Joint Administration of Chapter 11 Cases [Docket No. 2];
2. **Exhibit B** - Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms [Docket No. 5];
3. **Exhibit C** - Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief [Docket No. 6]; and

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

4. **Exhibit D** - Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes [Docket No. 7].

Dated: January 20, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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PROPOSED FOR THE DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of January 2021 a true and correct copy of the foregoing was served on all parties receiving notice via this Court's CM/ECF notification system.

/s/ John D. Gaither

John D. Gaither